

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Qynesha S. Tolbert,
Debtor.

Case No. 21-12992-amc

Chapter 13

Response to ECF No. 34

**Debtor's Response to Motion for Relief
from the Automatic Stay Under Section 362**

Debtor Qynesha S. Tolbert, by and through her attorney, hereby responds to the Motion for Relief from the Automatic Stay Under Section 362 filed by Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.

Ms. Tolbert opposes the motion because she can cure the arrearage if permitted to include curative payments in a modified chapter 13 plan. Accordingly, no grounds for relief exist.

NOW, THEREFORE, Ms. Tolbert asks this Court to deny the motion in the form of order attached.

Date: October 31, 2022

CIBIK LAW, P.C.
Counsel for Debtor Qynesha S. Tolbert

By: */s/ Michael I. Assad*
Michael I. Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Response to Motion for Relief from the Automatic Stay Under Section 362 to be served on Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc. through the CM/ECF system along with all attachments.

Date: October 31, 2022

/s/ Michael I. Assad
Michael I. Assad

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Qynesha S. Tolbert,

Debtor.

Case No. 21-12992-amc

Chapter 13

Related to ECF No. 34

ORDER

AND NOW, upon consideration of the Motion for Relief from the Automatic Stay Under Section 362 filed by Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc., and after notice and hearing, it is hereby **ORDERED** that the motion is **DENIED**.

Date:

Ashely M. Chan
U.S. Bankruptcy Judge